NJID 828309

PHELAN HALLINAN DIAMOND & JONES, PC 1617 JFK Boulevard, Suite 1400 Philadelphia, PA 19103 856-813-5500 Attorneys for THE MONEY SOURCE INC.

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

IN RE: : CHAPTER 13

JOSHUA COTTMAN

: CASE NO. 19-19686-ABA

Debtor : NOTICE OF MOTION FOR

: RELIEF FROM AUTOMATIC : STAY PURSUANT TO 11 USC : SECTION 362(d) AND RELIEF : FROM CO-DEBTOR STAY : PURSUANT TO 11 USC

: **SECTION 1301(c)**

JOSHUA COTTMAN BRAD J SADEK, ESQUIRE 461 DEER ROAD 1315 WALNUT STREET

CHERRY HILL, NJ 08034 STE 502

PHILADELPHIA, PA 19107

JANIQUE COTTMAN ISABEL C. BALBOA

461 DEER ROAD CHAPTER 13 STANDING TRUSTEE CHERRY HILL, NJ 08034 CHERRY TREE CORPORATE CENTER

535 ROUTE 38 - SUITE 580 CHERRY HILL, NJ 08002

U.S. TRUSTEE

US DEPT OF JUSTICE

OFFICE OF THE US TRUSTEE ONE NEWARK CENTER STE 2100

NEWARK, NJ 07102

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY (REAL PROPERTY)

THE MONEY SOURCE INC. (hereinafter 'Movant') has filed papers with the Court to have an Order entered granting it relief from the automatic stay and co-debtor stay against the property commonly known as 461 DEER ROAD, CHERRY HILL, NJ 08034.

Your rights may be affected. You should read these papers carefully and discuss them

with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney,

you may wish to consult one).

If you do not want the Court to grant Movant relief from the automatic stay and co-debtor

stay regarding the above real property, or if you want the Court to consider your views on the

Motion, then on or before 10/22/2019 [seven 7 days before the hearing date of the within motion]

you or your attorney must:

File with the Court a written response to Movant's Motion explaining your position. Your

response must be filed with the Bankruptcy Clerk of the United States Bankruptcy Court, 402 East

State Street, Trenton, New Jersey 08608.

If you mail your response to the Court for filing, you must mail it early enough so the Court

will receive it on or before the date stated above.

You must also mail a copy to:

/s/ Nicholas V. Rogers

Nicholas V. Rogers, Esq.

Phelan Hallinan Diamond & Jones, PC

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Philadelphia, PA 19103

Tel: 856-813-5500 Ext. 42689

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U.S. Trustee

ISABEL C. BALBOA

CHAPTER 13 STANDING TRUSTEE

CHERRY TREE CORPORATE CENTER

535 ROUTE 38 - SUITE 580

CHERRY HILL, NJ 08002

If you are opposing the Order Movant is seeking from the Court, you must attend the hearing scheduled to be held on 10/29/2019 at 10:00 a.m. at the United States Bankruptcy Courthouse, 400 Cooper Street, Fourth Floor, Camden, NJ 08101, before the Honorable Andrew B. Altenburg, Jr, presiding.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief.

Dated: August 12, 2019

/s/ Nicholas V. Rogers Nicholas V. Rogers, Esq. Phelan Hallinan Diamond & Jones, PC 1617 JFK Boulevard, Suite 1400 Philadelphia, PA 19103

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